

Exhibit 3

From: [Terry M McKeever](#)
To: [Andrew Spadoni](#)
Subject: FW: Gilbert
Date: Wednesday, December 15, 2021 9:26:13 AM
Attachments: [image001.png](#)

See below.

From: Preston Dugas [mailto:preston@pjdlawfirm.com]
Sent: Thursday, December 09, 2021 9:07 AM
To: Darrell Downs; Jacob Daniel; Paige Broyles
Cc: Terry M McKeever
Subject: RE: Gilbert

Darrell,

Please make sure to include Terry. He's actually defending the deposition and is my co-counsel on this case.

Can we agree to conduct this one deposition via Zoom and all others in person?

Lastly, I do not represent Dr. Altschule. I will be responding to any subpoena though.

Preston J. Dugas III

Attorney



1701 River Run, Suite 703

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From: Darrell Downs <DDowns@soonerlaw.com>
Sent: Thursday, December 9, 2021 8:49 AM
To: Preston Dugas <preston@pjdlawfirm.com>; Jacob Daniel <jdaniel@soonerlaw.com>; Paige

Broyles <pbroyles@soonerlaw.com>

Subject: Gilbert

Preston,

I need to get a subpoena out to Altschule if you are not representing him for the deposition so let me know. Thanks.

Darrell

From: [Terry M McKeever](#)
To: [Andrew Spadoni](#)
Subject: FW: Altschule Deposition
Date: Wednesday, December 15, 2021 9:26:56 AM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)

See below.

From: Preston Dugas [mailto:preston@pjdlawfirm.com]
Sent: Tuesday, December 07, 2021 9:43 AM
To: Darrell Downs; Jacob Daniel
Cc: Terry M McKeever
Subject: RE: Altschule Deposition

I don't like Zoom depositions either, and I'm not driving this ship. But, if you want to make all depositions via Zoom we can. I'm just telling you Dr. Altschule will not agree to conduct an in person deposition or at least that is what he's told Brianna.

Preston J. Dugas III

Attorney



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From: Darrell Downs <DDowns@soonerlaw.com>
Sent: Tuesday, December 7, 2021 9:20 AM
To: Preston Dugas <preston@pjdlawfirm.com>; Jacob Daniel <jdaniel@soonerlaw.com>
Subject: Re: Altschule Deposition

I do not like Zoom depositions where there are the number of images in his report that will have to be discussed. I will have to discuss this with my client to determine how they want to proceed.

Be advised however, the goose/gander rule will apply. If only zoom depositions are allowed for Altschule then the same limitation will apply for all of the defendant's witnesses.

From: Preston Dugas <preston@pjdlawfirm.com>

Date: Tuesday, December 7, 2021 at 9:13 AM

To: Darrell Downs <DDowns@soonerlaw.com>

Cc: Jacob Daniel <jdaniel@soonerlaw.com>, Paige Broyles <pbroyles@soonerlaw.com>, Jen Saenz <jen@pjdlawfirm.com>, Terry M McKeever <tmm@fylaw.com>, Brianna Whitley <brianna@pjdlawfirm.com>

Subject: RE: Altschule Deposition

Darrell,

Dr. Altschule has informed us that he is only agreeing to depositions via Zoom at this time. Let me know if that's going to be an issue we need to work out with the Court.

Preston J. Dugas III

Attorney



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From: Darrell Downs <DDowns@soonerlaw.com>

Sent: Monday, December 6, 2021 5:01 PM

To: Preston Dugas <preston@pjdlawfirm.com>

Cc: Jacob Daniel <jdaniel@soonerlaw.com>; Paige Broyles <pbroyles@soonerlaw.com>; Jen Saenz <jen@pjdlawfirm.com>; Terry M McKeever <tmm@fylaw.com>; Brianna Whitley

<brianna@pjdlawfirm.com>

Subject: Re: Altschule Deposition

Preston,

I will work on dates.

Does Dr. Altschule have a conference room we can use for his deposition or do we need to conduct the deposition in a court reporter's office? I do not suspect the deposition will last all that long if he testifies consistent with his report.

Let us know. Thanks.

Darrell

From: Preston Dugas <preston@pjdlawfirm.com>

Date: Monday, December 6, 2021 at 11:00 AM

To: Darrell Downs <DDowns@soonerlaw.com>

Cc: Jacob Daniel <jdaniel@soonerlaw.com>, Paige Broyles <pbroyles@soonerlaw.com>, Jen Saenz <jen@pjdlawfirm.com>, Terry M McKeever <tmm@fylaw.com>, Brianna Whitley <brianna@pjdlawfirm.com>

Subject: RE: Altschule Deposition

Darrell,

We want to take the Defendant's Corp Rep Deposition. Below are the topics. Can you please send dates in January?

- a. the Insurance Policy at issue in this lawsuit.
- b. Defendant's Claim decision for the insurance claim forming the basis of this lawsuit;
- c. Defendant's estimating guidelines;
- d. Training of adjusters in all aspects of the claims handling process for Claims made in Oklahoma from 2019 through 2021 including but not limited to how to determine if hail has caused damage;
- e. Proper claims handling procedures for Claims made in Oklahoma from 2019 through 2021;
- f. Traveler's opinion that the built up roof with gravel and standing seam metal roof did not sustained hail damage;
- g. Traveler's opinion that the HVAC units can be repaired rather than needing to be replaced;
- h. Traveler's criteria for determining the applicability of overhead and profit, including categories of items that were excluded from the application of overhead and profit

in the preparation of estimates for Claims;

- i. All email and electronic communication systems used by Defendant in handling Claims in Oklahoma including the retention policies associated with these systems and the name and job description of each person with administrative access to the these systems.

Preston J. Dugas III

Attorney



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From: Darrell Downs <DDowns@soonerlaw.com>

Sent: Friday, December 3, 2021 12:15 PM

To: Preston Dugas <preston@pjdlawfirm.com>

Cc: Jacob Daniel <jdaniel@soonerlaw.com>; Paige Broyles <pbroyles@soonerlaw.com>; Jen Saenz <jen@pjdlawfirm.com>; Terry M McKeever <tmm@fylaw.com>; Brianna Whitley <brianna@pjdlawfirm.com>

Subject: Re: Altschule Deposition

Thanks Brianna!

Sent from my iPhone

On Dec 3, 2021, at 11:54 AM, Preston Dugas <preston@pjdlawfirm.com> wrote:

Brianna – we need to get this scheduled. Please make this a priority.